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IN CAMERA REVIEW

April 15, 2022

VIA E-MAIL AND ECF

The Honorable Toby J. Heytens
The Honorable Margaret B. Seymour
The Honorable Richard M. Gergel

Re: *In Camera Review - South Carolina State Conference of the NAACP v. Alexander*, 3:21-cv-03302-MBS-TJH-RMG

Dear Judge Heytens, Judge Seymour, and Judge Gergel:

Pursuant to the Court's April 13, 2022 Order (ECF 221), Plaintiffs, The South Carolina Conference of the National Association for the Advancement of Colored People and Mr. Taiwan Scott, submit an amended privilege log (**Exhibit A**) containing the disputed documents Plaintiffs have asserted either the attorney client or attorney work product privileges over. Simultaneously, Plaintiffs are submitting the 23 listed documents for an *in camera* review via email. The documents are contained in two separate .zip files, one for each Plaintiff.

Under an agreement between Plaintiffs and House Defendants, Plaintiffs have removed from the privilege logs all communications between counsel of record and their clients that were created after October 12, 2021, the filing date of Plaintiffs' original complaint. At this time, those documents are not in dispute.

The password for the two .zip files is: ***canyon aqua 37 Tiger window!***

Plaintiffs appreciate your time and attention to this matter.



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Sincerely,

/s/ John M. Hindley

John Hindley

Attachment

cc: Christopher J. Bryant
Allen Chaney
Antonio Ingram
John Cusick
Leah Aden
Patricia Yan
Raymond Audain
Samantha Osaki
Somil Trivedi
Adriel Cepeda Derieux
Stuart Naifeh
Sarah Gryll
John Freedman
Gina Colarusso
Paula Ramer
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Anthony P. Ashton
Anna Kathryn Barnes